

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)

Gillman, Bruton & Capone, LLC
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Attorney for Debtor
By: Justin M. Gillman, Esq.

In Re:

Thomas D. Willshire

Debtors

Case No.: 16-26074

Judge: Hon. Rosemary Gambardella, U.S.B.J.

Chapter: 13

Hearing Date:

**OBJECTION TO MOTION OF NATIONSTAR MORTGAGE, LLC TO
APPROVE LOAN MODIFICATION AGREEMENT**

Justin Gillman, Esq., Gillman, Bruton & Capone, LLC, attorneys for the Debtor, Thomas D. Willshire, hereby submits this Objection to the Motion of Nationstar Mortgage, LLC to Approve Loan Modification Agreement for the reasons set forth below.

The motion to approve a loan modification is effectively a motion to obtain credit pursuant to 11 U.S.C. §364. The Trustee or the Debtor may move for this relief. This Motion was filed on behalf of the secured creditor.

Further, on July 3, 2019, the Debtor filed a Motion for Approval of Loan Modification Agreement with the Debtor's Certification in support of the Motion.

Therefore, the Debtor requests that the Motion of Nationstar Mortgage, LLC to Approve Loan Modification be denied.

Respectfully submitted,

Dated: 7/17/2019

/s/ Justin Gillman

Justin Gillman, Esq.
Gillman, Bruton & Capone, LLC
Attorney for the Debtor